



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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EMN:SPN  
F.#2014R00190

271 Cadman Plaza East  
Brooklyn, New York 11201

April 4, 2016

By ECF

The Honorable Raymond J. Dearie  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re:     United States v. José Hawilla et al.  
Criminal Docket No. 14-609 (RJD)

Dear Judge Dearie:

The government respectfully requests that the sentencing control date for defendants José Hawilla, Traffic Sports USA, Inc., and Traffic Sports International, Inc., currently set for April 8, 2016 at 10:00 a.m., be adjourned to October 14, 2016 at 10:30 a.m., a date and time the parties have been informed is convenient for the Court. Defense counsel have been consulted and join in this request.

An adjournment of the sentencing control date for defendant Hawilla for at least six months is appropriate under the circumstances in light of his continuing cooperation with the government's investigation. Defense counsel have indicated that the corporate defendants require additional time to resolve outstanding issues in advance of sentencing. This is the parties' second request for an adjournment of the sentencing control date. The first

request was granted by the Court on September 23, 2015 and adjourned the control date from September 25, 2015 to April 8, 2015.

Respectfully submitted,

ROBERT L. CAPERS  
United States Attorney  
Eastern District of New York

By: \_\_\_\_\_/s/

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